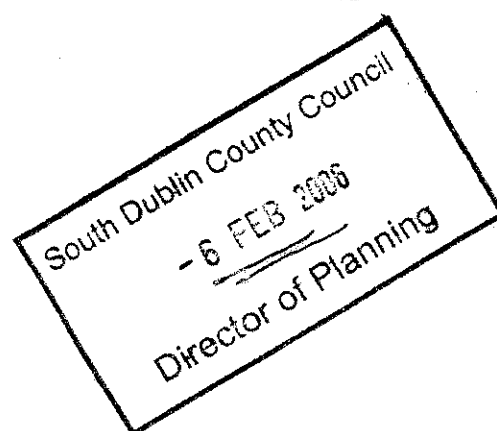


Our Ref:

Your Ref:

3rd February 2006

Mr. Tom Doherty
Director of Planning
South Dublin County Council
Tallaght
Dublin 24



Re:- LUAS – Tallaght – Garter Lane

Dear Mr. Doherty,

I refer to my meeting with Councillor Therese Ridge, Mayor on the 31st January 2006 and subsequent letter dated 3rd February 2006 received from the Mayor, (copy enclosed).

I now formally submit for your consideration request for rezoning of 46.5 acres to residential as identified on drawing no. 4560-500 enclosed, on the basis of my signed agreement to pay one third of the cost, estimated at €13 million for the LUAS extension to Garter Lane. Also enclosed is a copy of the letter dated 31st January 2006 to Brendan Hickey, Deed of adherence and side letter duly signed. The drawing no. referred to in the letter is similar to above.

As confirmed by you at our meeting on the 26th January 2006, the Council proposes to initiate a variation procedure for the land at the junction of Fortunestown Lane and Garter Lane and on an equitable basis it is requested that the some variation procedures be initiated for the 46.5 acres. I understand that Green Belt zoning applies in both cases.

My original proposal referred to 75 acres as outlined on the map handed to Mr. Micheal Kenny, Acting Director of Planning at meeting on the 7th November 2005. In view of your non-commitment to initiate a variation to this proposal, the reduced area should be more acceptable.

It is suggested that the requested rezoning is reasonable having regard to the fact that the underlying zoning is not unduly compromised, to the tremendous local community benefit by the extension of the LUAS to Garter Lane, a once off opportunity and having regard to the variation proposed to be initiated by the Council.

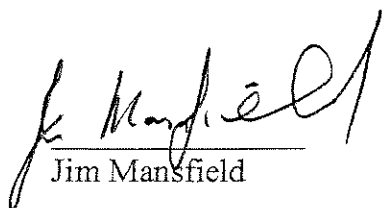
I would emphasise that I was requested by Brendan Hickey at Item 3 in his letter dated 28th November 2005 addressed to Seamus Kearney that "the Mansfield Group would enter into a similar agreement as that entered into between DHP and Harcourt". This I have done with a reduced area requested for rezoning variation.

It is worth noting that I suggested to Brendan Hickey in letter dated 21st January 2006, copy enclosed, that a meeting be arranged between the Council and the three financial contributors to progress the proposed extension and "if the third party also received zoning as discussed there would then appear to be a reasonable equitable distribution of the benefits". It is not clear to me why this meeting was not arranged. Furthermore, I understand you endeavoured to arrange a similar meeting.

It would be reasonable to suggest that legitimate equitable expectation arises where equality of financial commitment arises in order to achieve a public gain and benefit.

An urgent meeting is requested as I understand that the Railway Procurement Agency is about to advertise a public consultation process to either Fortunestown Lane or Garter Lane. In the circumstances a telephone call re appointment would be appreciated.

Yours sincerely,



Jim Mansfield

c.c. Brendan Hickey
Micheal Sheedy R.P.A.

SOUTH DUBLIN COUNTY COUNCIL
COMHAIRLE CONTAE ÁTHA CLIATH THEAS

Mayor Thérèse Ridge

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03 February 2006

Mr Jim Mansfield
City West Hotel and Conference Centre
Saggart
Co Dublin

Dear Mr Mansfield,

I refer to your meeting with me on Tuesday 31st January in connection with your interest in the Citywest Luas proposal.

I have briefed the Manager on our discussion and you should note that the Council has not received the documentation you left with me, which I now enclose. You may wish to submit this formally to the Council in the knowledge that it would be subject to Freedom of Information legislation.

Alternatively, you may wish to submit a summary of the information therein.

I trust that this is helpful to you.

Yours sincerely,

THÉRÈSE RIDGE
MAYOR
SOUTH DUBLIN COUNTY COUNCIL

c.c. Mr Frank Kavanagh
Mr Alan Dukes